

REID RUBINSTEIN & BOGATZ

I. SCOTT BOGATZ, ESQ.

Nevada Bar No. 3367

KERRY E. KLEIMAN, ESQ.

Nevada Bar No. 14071

300 South 4th Street, Suite 830

Las Vegas, Nevada 89101

Telephone: (702) 776-7000

Facsimile: (702) 776-7900

sbogatz@rrblf.com

kkleiman@rrblf.com

Attorneys for Defendant

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

BRIAN BORENSTEIN,

Plaintiff,

v.

THE ANIMAL FOUNDATION, et al.,

Defendants.

Case No.: 2:19-cv-00985-APG-DJA

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND TIME FOR THE
ANIMAL FOUNDATION TO RESPOND
TO PLAINTIFF'S FIRST AMENDED
COMPLAINT [ECF NO. 41]
[FIRST REQUEST]**

IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiff, BRIAN BORENSTEIN, and Defendant, THE ANIMAL FOUNDATION ("TAF"), by and through their undersigned counsel, that Defendant TAF may have additional time within which to answer or otherwise respond to Plaintiff's First Amended Complaint [ECF No. 41], which was served electronically on Defendant on May 6, 2020, but which had been stayed until June 11, 2020 [*see* ECF No. 46].

Therefore, the parties agree that the last day for TAF to answer or otherwise respond to Plaintiff's First Amended Complaint is extended from Thursday, June 25, 2020 to **Thursday, July 9, 2020**.

This request is made in good faith and not for the purpose of undue delay. This document is being electronically filed through the Court's CM/ECF System. Accordingly, counsel for Defendants hereby attests that (1) the content of this document is acceptable to all persons required to sign the document; (2) Plaintiff's counsel has concurred with the filing of this document and

has authorized defense counsel to affix her electronic signature hereto; and (3) a record supporting this concurrence could be made available if so ordered by this Court.

Dated this 24th day of June, 2020.

Respectfully submitted,

REID RUBINSTEIN & BOGATZ

THE PALMER LAW FIRM, P.C.

By: /s/ Kerry E. Kleiman, Esq.

By: /s/ Raelene K. Palmer, Esq.

I. Scott Bogatz, Esq. (3367)
Kerry E. Kleiman, Esq. (14071)
REID RUBINSTEIN & BOGATZ
300 South Fourth Street, Suite 830
Las Vegas, Nevada 89101
Attorneys for Defendant
American Express National Bank

Raelene K. Palmer, Esq. (8602)
5550 Painted Mirage Road, Suite 320
Las Vegas, Nevada 89149

Robert S. Melcic, Esq. (14923)
4930 Mar Vista Way
Las Vegas, NV 89121
Attorneys for Plaintiff

ORDER

IT IS SO ORDERED.

DATED this 25th day of June, 2020.

UNITED STATES MAGISTRATE JUDGE

REID RUBINSTEIN & BOGATZ

300 South 4th Street, Suite 830
Las Vegas, Nevada 89101
(702) 776-7000 FAX: (702) 776-7900